

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

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MURAD Y. AMEEN

vs.

AMPHENOL PRINTED CIRCUITS, INC.

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DEPOSITION of RAYMOND PRATT,
Deposition taken at Upton & Hatfield,
10 Centre Street, Concord, New Hampshire,
on Thursday, March 21, 2013,
commencing at 10:05 a.m.

Court Reporter:
Pamela Carle, LCR, RPR, CRR
New Hampshire LCR No. 98

1 my attention.

2 Q. Who is that?

3 A. Paul Connors.

4 Q. And how did -- did Paul come to see you
5 at an office?

6 A. No.

7 Q. How did this come about?

8 A. I was going down into the department,
9 which is the drill department, and talking to Paul,
10 who was also a group leader, about the need to, you
11 know, staff the department and working overtime to
12 hit our commitments, and Paul seemed a little
13 frustrated, and he had -- about people working
14 within that department not -- not being in there,
15 and the need for us to work overtime, and that's
16 when he let me know that -- he told me that Murad
17 had been outside the department for extended
18 periods of time.

19 Q. So what did Paul say and what did you
20 say during this conversation?

21 A. As I just stated, Paul said that he was
22 outside the department for extended periods of
23 time, and that that -- my response was that, you

1 commitments.

2 Q. Okay. So that's the beginning of the
3 conversation is, in fact, you're talking about the
4 need to get employees to sign up for overtime?

5 A. The need to staff and work extra hours,
6 whether it be overtime, or alternating their
7 schedules to -- to fulfill the gaps that we have in
8 staffing to be able to get the work out.

9 Q. And you were aware at this time that
10 Murad Ameen was not working the overtime shifts
11 that he had worked for many years before 2012?

12 A. Yes. Yes.

13 Q. When did you become aware that Murad
14 was starting to not volunteer for overtime?

15 A. Back in 2010, I believe. He --

16 Q. Go ahead.

17 A. He worked some overtime, and it started
18 to slow down back in 2010.

19 Q. So you're saying that Murad typically
20 worked only 40 hours a week after 2010? Can you
21 give me some idea?

22 A. No, he reduced his -- I would say he
23 reduced his overtime. Worked 40 hours a week or